

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

FILED-ED4 8  
01 OCT -9 AM 11:08  
CLERK  
U.S. DISTRICT COURT

MARVIN SYKES

Plaintiff,

v.

CITY OF CHICAGO,  
a municipality; DETECTIVE  
GLENN GODBOLD Star No. 20187  
his official capacity and his  
individual capacity; JEANEEN  
GODBOLD in her official and  
and individual capacity

Defendants.

No.

**01C 7756**  
**JUDGE NORGLÉ**

**MAGISTRATE JUDGE SCHENKIER**

COMPLAINT

**DOCKETED**  
OCT 09 2001

The Plaintiff Marvin Sykes, by and through his attorneys, Holzman & Levinsohn, complain of the Defendants, City of Chicago, Detective Glenn Godbold, in his individual and official capacity, and Jeaneen Godbold, in her individual and official capacity as follows:

JURISDICTION AND VENUE

1. That this is a civil action for damages to redress deprivations under color of law, rights, privileges and immunities secured by the 4th, and 14th Amendments to the United States Constitution, and Title 42 U.S.C. Sections 1983 and 1988. That all acts complained of took place in the Northern District

of Illinois, Eastern Division. The Court has jurisdiction of this action under Title 28 U.S.C. Sections 1331 and 1343.

**PARTIES**

2. The Plaintiff Marvin Sykes is a natural persons.

3. The Defendant City of Chicago, is a municipality organized under Illinois law and located in Cook County, Illinois.

4. Defendant Glenn Godbold was at all relevant times a sworn member of the Chicago Police Department and acting under color of state law.

5. Defendant Jeaneen Godbold was at all relevant times an employee of the Chicago Police Department acting under color of state.

**FACTS**

6. On the evening of October 15, 2000, Marvin Sykes, Glenn Godbold, and Jeaneen Godbold were in the Burlington Coat Factory located in North Riverside, Illinois.

7. At the aforesaid time and place, Glenn Godbold pushed Mr. Sykes to the floor.

8. Mr. Godbold told Mr. Sykes that he would kill him if he spoke to his wife.

9. Mr. Godbold then got on top of Mr. Sykes, pulled out his gun, and placed it in Mr. Sykes mouth.

10. Ms. Jeaneen Godbold kicked Mr. Sykes on the arm and threatened to "beat his ass."

PLAINTIFFS DEMAND A JURY TRIAL.

Respectfully submitted,

  
MICHAEL J. LEVINSOHN

MICHAEL J. LEVINSOHN  
HOLZMAN & LEVINSOHN  
53 W. Jackson Blvd.,  
Suite 1350  
Chicago, IL 60604  
(312) 427-2163

Civil Cover Sheet

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Cat # 2

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS D-ED4

JUDGE NORGLER

01C 7756 Civil Cover Sheet

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CLERK  
U.S. DISTRICT COURT

This automated JS-44 conforms generally to the manual JS-44 approved by the Judicial Conference of the United States in September 1974. The data is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. The information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is authorized for use only in the Northern District of Illinois.

MAGISTRATE JUDGE SCHENKIER

Plaintiff(s): MARVIN SYKES

Defendant(s): CITY OF CHICAGO, GLENN  
GODBOLD, and JEANEEN GODBOLD

County of Residence: Cook

County of Residence: Cook

Plaintiff's Atty: Michael J. Levinsohn  
Holzman & Levinsohn  
53 W. Jackson, Suite 1350  
312 427-2163

Defendant's Atty:

DOCKETED  
OCT 09 2001II. Basis of Jurisdiction:

3. Federal Question (U.S. not a party)

III. Citizenship of PrincipleParties (Diversity Cases Only)

Plaintiff:- N/A

Defendant:- N/A

IV. Origin :

1. Original Proceeding

V. Nature of Suit:

440 Other Civil Rights

VI. Cause of Action:

42 U.S.C. Section 1983, Defendants unlawfully battered Plaintiff and signed false complaint against defendant

VII. Requested in Complaint

Class Action:

Dollar Demand:

Jury Demand: Yes

VIII. This case IS NOT a refiling of a previously dismissed case.Signature: Date: 

If any of this information is incorrect, please go back to the Civil Cover Sheet Input form using the *Back* button in your browser and change it. Once correct, print this form, sign and date it and submit it with your new civil action. **Note: You may need to adjust the font size in your browser display to make the form print properly.**

Revised: 06/28/00

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

In the Matter of: MARVIN SYKES

MAGISTRATE JUDGE SCHENKIER

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v.

CITY OF CHICAGO, GLENN GODBOLD, and JEANEEN  
GODBOLD

Case Number: U.S. DISTRICT COURT

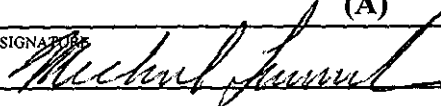
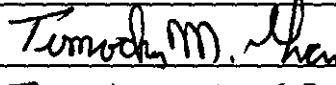
JUDGE NORCLE

**01C 7756**

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR:

MARVIN SYKES

**DOCKETED**  
OCT 09 2001

(A)		(B)	
SIGNATURE 		SIGNATURE 	
NAME Michael J. Levinsohn		NAME Timothy M. GRACE	
FIRM Holzman & Levinsohn		FIRM Holzman & Levinsohn	
STREET ADDRESS 53 W. Jackson Blvd., Suite 1350		STREET ADDRESS 53 W. JACKSON 1350	
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E-MAIL ADDRESS		E-MAIL ADDRESS	
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TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
		DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>	
(C)		(D)	
SIGNATURE		SIGNATURE	
NAME		NAME	
FIRM		FIRM	
STREET ADDRESS		STREET ADDRESS	
CITY/STATE/ZIP		CITY/STATE/ZIP	
TELEPHONE NUMBER	FAX NUMBER	TELEPHONE NUMBER	FAX NUMBER
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